

To: Aaron, Mark[aaron.mark@epa.gov]
From: Doherty, Paul
Sent: Wed 10/28/2015 8:33:26 PM
Subject: FW: Flow Line Contingency Plan
D&Z Contingency Plan Checklist.doc

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From: Doherty, Paul
Sent: Friday, October 23, 2015 9:08 AM
To: 'bill@lonestar-spcc.com' <bill@lonestar-spcc.com>
Subject: RE: Flow Line Contingency Plan

Bill:

I've reviewed the draft Flow Line Maintenance and Contingency Plan against our Contingency Plan checklist and find there are a couple elements not addressed.

The SPCC regulations state that an oil spill contingency plan should follow 40 CFR part 109. EPA's checklist is based on 40 CFR part 109 requirements. That said, I realize that there may be some elements that are not applicable to a small lease operation. I recommend incorporating some language in the Plan to clearly state which requirements of 40 CFR part 109 are not applicable to the facility.

For example, establishing prearranged procedures for requesting assistance during a major disaster or when the situation exceeds the response capabilities of the state, local or regional authority is not the responsibility of the lease owner/operator. Referencing applicable state and local plans, the Regional Contingency Plan and the NCP would address this and possibly other requirements that would not be applicable to the lease operation.

The components of the plan that address flowline maintenance are acceptable.

If I've missed something in the plan that you believe addresses a requirement on the checklist let me know.

Any questions let me know

Thanks

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From: bill@lonestar-spcc.com [<mailto:bill@lonestar-spcc.com>]
Sent: Wednesday, October 21, 2015 12:06 PM
To: Doherty, Paul <Doherty.Paul@epa.gov>
Subject: Flow Line Contingency Plan

Paul

We have been working with D & Z exploration. We have made changes to are plan to try to satisfy what you need. We have changed the paragraph that read testing flow lines to visual inspection. I am sending you the new flow line contingency for your review and comments please review and get back to me. This is just an example if approved we will make it lease specific for D & Z and all other operators we work for. The only problem that I see is they might not want to pay for it it is very time consuming.

Bill McCourry

Lonestar Consulting

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